

September 20, 2005

BY OVERNIGHT MAIL AND E-MAIL

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

RE: D.T.E. 01-106, Investigation by the Department of Telecommunications and Energy on its own Motion to Increase the Participation Rate for Discounted Electric, Gas and Telephone

Service Pursuant to G.L. c. 159, §105 and G.L. c. 164, § 76

Dear Secretary Cottrell:

Fitchburg Gas and Electric Light Company d/b/a Unitil ("Unitil") submits its responses to the Department of Telecommuncations and Energy's First Set of Information Requests in the above captioned proceeding.

Thank you for your attention to this matter.

cc: Jeanne Voveris, Esquire, Hearing Officer

Ronald LeComte, Director, Electric Power Division

Kevin Brannelly, Director, Rates and Revenue Requirements

George Yiankos, Director, Gas Division

D.T.E. 01-106 Service List

Gary Epler Senior Counsel

6 Liberty Lane West Hampton, NH 03842-1720

Phone: 603-773-6440 Fax: 603-773-6640 Email: epler@unitil.com

Commonwealth of Massachusetts

Department of Telecommunications and Energy Investigation to Increase the Participation Rate for Discounted Electric, Gas and Telephone Service

Docket No: D.T.E. 01-106

Department's First Set of Information Requests

Request No. DTE 1-1

On an individual company basis, please provide the amount of low-income discount that is currently included in base rates. Provide a citation to the company's last base rate proceeding or settlement where this amount was established. Provide the number of customers on each low-income discount rate at the end of the test year that was used in the company's last base rate proceeding or settlement. Provide the number of customers on each low-income discount rate as of August 1, 2005. In addition, provide the total consumption of the low-income customers for each low-income rate class.

Response:

The amount of low income discount currently included in base rates for Fitchburg Gas and Electric Light Company's ("Unitil's") Gas and Electric Divisions is as follows:

Gas Division

R2 Class: \$17,778 R4 Class: \$196,075

Electric Division

R2 Class: \$258,487

See D.T.E. 02-24/25, December 19, 2002 Final Compliance Filing
Tab J (Gas) DTE Schedule 10 (Updated) Schedule JLH-7(Gas)-Compliance Page 6 of 7
Tab G (Electric) Schedule JLH-4 (Electric)—Compliance Page 3 of 4, DTE Schedule 10
(Electric) — Compliance

The test year used in D.T.E. 02-24/25 was 2001. The number of customers on low income rates in December of 2001 was:

Gas Division

R2 Class: 175 customers R4 Class: 1.118 customers

Electric Division

R2 Class: 1,925 customers

As of August 1, 2005, the number of customers and their consumption was:

Gas Division

R2 Class: 259 customers using 3,625 therms R4 Class: 1,336 customers using 23,972 therms

Electric Division

R2 Class: 2,296 customers using 1,305,710 kWh

Person Responsible: Karen M. Asbury Date: September 20, 2005

Department's First Set of Information Requests

Request No. DTE 1-2

On an individual company basis, please provide the amount of low-income discount that was included in base rates when the company's rates were unbundled. Also, provide the number of customers on each low-income discount rate as of the date that the company's rates were unbundled.

Response:

Gas Division

Rates were unbundled for Unitil's Gas Division in its 1998 gas rate case, D.T.E. 98-51. In its compliance filing dated February 10, 1999, the amount of low-income discount included in base rates was \$14,693 for the R2 Class and \$103,618 for the R4 Class. See Tab G, Exhibit FG&E-JLH-8-3 Compliance, Schedule 7. In February 1999, the number of customers in the R2 class was 245 customers and the number of customers in the R4 Class was 969.

Electric Division

Electric division rates were unbundled in D.T.E. 97-115/98-120. In its compliance filing dated February 1, 1999 the low-income discount included in base rates was \$198,909 as shown on Attachment DTE-1-2. For consistency with that filing, the discount is computed using 1998 forecast billing determinants. In February 1999 the number of customers in the R2 class was 1,646 customers.

Person Responsible: Karen M. Asbury Date: September 20, 2005

Fitchburg Gas and Electric Light Company DTE 97-115 / 98-120 Compliance Filing Rate Design February 1, 1999

Rate RD-1		Rate	Billing <u>Units</u>	
	Customer Charge Base Distribution Charge	\$2.84 \$0.03991	21,420 133,568,425	
Rate RD-2	!	<u>Rate</u>	Billing Units	
	Customer Charge Base Distribution Charge	\$1.76 \$0.01689	1,888 8,552,131	
Rate RD-2	Discounted Base Revenue	Rate Discount	Billing	Revenue
	Customer Charge Base Distribution Charge	\$1.08 \$0.02302	<u>Units</u> 1,888 8,552,131	Discount \$2,039 \$196,870
	Total			\$198,909

Department's First Set of Information Requests

Request No. DTE 1-3

Please discuss which interest rate is appropriate to apply to any over- or under-recovery that results from a cost recovery mechanism.

Response:

Unitil believes the appropriate interest rate to use for its cost recovery mechanisms for its Gas and Electric Divisions is Bank of America's prime lending rate. This is consistent with the interest rate used for calculating monthly interest for Unitil's Pension/PBOP Adjustment mechanisms. In addition, this rate is used for components of the Cost of Gas Adjustment Clause and the Local Distribution Adjustment Clause

Person Responsible: Karen M. Asbury Date: September 20, 2005

Docket No: D.T.E. 01-106
Department's First Set of Information Requests

Request No. DTE 1-4

Please provide a detailed explanation of the company's existing traditional outreach methods (i.e., not including the computer matching program) to ensure that the low-income discount rate is available to eligible customers. How often is each method of outreach conducted? What is the protocol for signing up new customers for the low-income discount rate under these traditional outreach methods? What is the protocol for removing customers from the low-income rate under traditional outreach methods?

Response:

Outreach Efforts

The methods used to reach the target audience include the following: welcome kits, bill inserts, customer service training, agency collaboration, school lunch program, targeted customer communications and customer education and outreach.

Welcome Kits

Unitil communicates with new customers who may qualify for the discounted rate via our welcome kit fulfillment program. After a customer has initiated new service, Unitil mails a welcome kit to the customer. The kit includes a welcome letter, residential discount rate information and other collateral material including a summary of rates, energy conservation, opt out information, and bill payment options.

Bill Inserts

Quarterly, the company prints an article in the customer newsletter on the Residential Discount Rate Program. The newsletter reaches approximately 31,000 Unitil customers.

Web Site

The Unitil website at www.Unitil.com provides customers with information about the residential discount rate, agency information and a copy of the Unitil discount rate application in both English and Spanish is available to download.

Customer Service Training

All Unitil customer service personnel are fully trained on the company's residential discount rate program and energy efficiency programs. This occurs as part of the initial 4-6 week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A review training session on the residential discount rate program is held annually. When a customer contacts Unitil

Commonwealth of Massachusetts Department of Telecommunications and Energy

Investigation to Increase the Participation Rate for Discounted Electric, Gas and Telephone Service

Docket No: D.T.E. 01-106
Department's First Set of Information Requests

regarding discount rate information, or indicates during the call they may be having financial difficulty, our representatives will provide discount rate enrollment information, agency information and contact telephone numbers for assistance.

- Agency Collaboration

Unitil collaborates with Low Income Home Energy Assistance (LIHEAP) agency, and other social service agencies to reach customers who are eligible for the residential discount rate.

Unitil, in partnership with the United Way of North Central Massachusetts, hosted a series of meetings, a "Community Energy Forum," in response to the anticipated hardships presented by severe weather conditions and rising utility costs in 2004-2005. Unitil's goal was to maximize awareness among key community service providers and to enable them to refer their constituents to available resources including but not limited to the residential discount rate program. Brochures/Applications were distributed to representatives from the agencies in attendance. Participants included Community Health Link, RCAP Solutions, Eagle House Senior Center, Greater Gardner CDC, Social Security Administration, Child Care Resources, Montachusett Opportunity Council, Spectrum Health Services, Gardner VNA, Montachusett Home Care Corporation, Our Father's House, Catholic Charities, Family Partnership Center, Spanish American Center, Medical Associates, New England Farm Workers Council, Highlands Adult Day Health, Multi-Service Center, Office of Ronald M. Ansin, North Central Career Center, Community Healthlink, Twin Cities CDC, Salvation Army, Cleghorn Neighborhood Center, LUK Inc., Center for Health & Development, Fitchburg Mayor's Office, City of Leominster, Fitchburg Fire & Emergency Management, Montachusett Interfaith Hospitality Network, Loaves & Fishes, Ginny's Helping Hand, as well as liaisons for local and state legislators.

School Lunch Program

Since 2003, the company has worked with the Superintendent of Schools in Fitchburg to enroll customers whose children are eligible for the free school breakfast/lunch program in the low-income discount program.

Customer Education

Unitil, in collaboration with New England Farm Workers' Council, Montachusett Opportunity Council and the Salvation Army developed a presentation entitled "Controlling Energy Costs." In the past year, the program was broadcast twice on WEIM

Docket No: D.T.E. 01-106
Department's First Set of Information Requests

(radio) interview/call in format, once on WGAW (radio), one televised interview on FATV (local cable access television) and one presentation at the Fitchburg YMCA.

- Targeted Customer Notice

During the winter moratorium months, Unitil mails information to all residential customers who may be having difficulty paying their bills evidenced by an outstanding balance 60 or more days past due. The information includes a list of social service agencies and their telephone numbers, in addition to text urging the customer to call the company for assistance.

Unitil sends a targeted mailing to all residential customers where household occupants are identified age 65 or older, which includes information about the residential discount rate program, fuel assistance, and other agency programs.

In the third quarter of each year, Unitil sends information about the fuel assistance program to all residential customers who have filed a declaration of financial hardship. The letter informs the customer about the residential discount rate program and provides sufficient information to initiate a fuel assistance application.

In addition, prior to the expiration of Fuel Assistance, Unitil sends a targeted mailing to all customers who qualified for Fuel Assistance in the previous year and approval has not yet been received for the current year.

On a quarterly basis, Unitil contacts customers who have been flagged elderly, medical or infant. Written and telephone communications provide residential discount rate program information as well as social service information and payment plan options.

Other Collateral

Unitil distributes a brochure/application for the residential discount rate program. This brochure is displayed at the Company's walk in payment center in Fitchburg. In addition, brochures/applications have been distributed to community leaders at the Unitil Consumer Advisory Council Meetings & Community Energy Forum Meetings.

Arrearage Management Pilot Program

As part of Unitil's settlement agreement in D.T.E. 05-29, effective September 15, 2005, Unitil, in collaboration with the Fuel Assistance agency, will launch a three (3) year pilot arrearage forgiveness program. The program will assist eligible participants in receiving the available services provided by the agencies in weatherization and fuel assistance network. The program will provide up to 200 customers with arrears forgiveness up to \$700.00, a budget payment plan to assist in paying overdue electric and/or gas bills, the

Department's First Set of Information Requests

opportunity to participate in the company's energy efficiency programs on a priority basis, and budget counseling services. The program is targeted at customers who have a demonstrated immediate need for financial assistance and who can achieve longer-term benefits by controlling their utility bills and managing their overall finances.

Enrollment / Removal Protocols

In order to qualify for the discount rate, a customer's total income cannot exceed 175 percent of the poverty level. In addition, the low-income discount rate is contingent upon participation in the fuel assistance program through LIHEAP or verification of a customer's participation in a means-tested public benefit.

Customers who receive fuel assistance are automatically enrolled on the low-income discount rate once we receive confirmation from the agency. The rate change is effective as of the last meter reading, prior to receiving the confirmation. Future bills are calculated on the discount rate for the next eighteen (18) months. Prior to the year end close of the fuel program, a letter is sent to all customers who received fuel assistance during the prior heating season encouraging them to reapply for the program for the current heating season. In April of each year, a mass mailing is sent to all customers who did not reapply or did not qualify for the fuel assistance program. The letter informs customers that their rate is scheduled to change in thirty (30) days, and provides them with an application, which can be completed and returned to the company with proof of another qualifying benefit to ensure continuity of the discounted rate. If the customer fails to renew the application or is simply no longer eligible for any of the qualifying benefits, the customer is removed from the low-income discount rate effective with the next bill, until such time as another completed, qualifying application is received by the company.

Unitil collaborates with agencies to verify the eligibility of customers for the discounted rates. The application is submitted and then reviewed by Unitil. If the customer has not included sufficient documentation to verify their eligibility for the rate, the customer is contacted and additional supporting documentation is requested. After receiving the appropriate verification either from an agency or the customer, Unitil will approve the application. Once approved, customers are enrolled in the residential discount rate program for a period of twelve (12) months. Customer's eligibility for the discount rate are tracked by date of enrollment. Letters are mailed to customers to advise that their eligibility for the discount rate will expire in thirty (30) days unless the customer provides the company with updated information. The letter is mailed together with an application and sufficient instructions to complete and return another application without suffering any lapse in the residential discount rate. Once a week, a report is produced which lists customers whose eligibility for the discounted rate has expired. If the customer fails to complete another application or no longer participates in a qualifying program, the customer is removed from the discounted rate.

Docket No: D.T.E. 01-106
Department's First Set of Information Requests

Customers who qualify for fuel assistance and meet income eligibility of 175 percent of the federal poverty guidelines or less, qualify for school lunch program or live in subsidized housing, do not need to complete a separate Unitil discount rate application in order to receive the benefit.

Department's First Set of Information Requests

Request No. DTE 1-5

Please provide a detailed explanation of how customers are recertified as eligible for the low-income discount rate each year under the traditional outreach process. How often does the recertification process occur? Are customers removed from the low-income discount rate until the customer confirms that he/she continues to be eligible for the low-income discount rate? If so, how are these customers tracked?

Response:

Agency Recertification

Customers who enroll in the residential discount rate program by written application are placed on the discount rate effective with their previous meter reading date, and future bill statements reflect the application of the low-income discount rate for the next twelve (12) month period. Customers are invited to recertify for the low-income discount rate by mail. The account is coded at the time of enrollment and a letter is automatically mailed to the customer thirty (30) days before the discounted rate is scheduled to expire. The letter notifies the customer of the proposed rate change and includes another application which can be completed and returned to the company prior to the expiration of the discounted rate. A weekly report lists customers whose eligibility for the low-income discount rate has expired. If a customer failed to renew the application or is simply no longer eligible, the customer is removed from the low-income discount rate effective with the next bill until such time as another completed application is received by the company.

School Lunch Program Recertification

Since 2003, the company has worked with the Superintendent of Schools in Fitchburg to enroll customers whose children are eligible for the school breakfast/school lunch program in the residential discount rate program. Each school sends applications for the residential discount rate program home with students during the first week of each school year. When the company receives the applications back from the school, the discount rate is applied to the customer's account with the next billing statement and continues for a period of twelve (12) months. For customers who were previously enrolled in the discount rate, the rate is continued on the customer's account for an additional twelve (12) months. For customers who were previously enrolled in the discount rate, and a new enrollment is not received, a letter is automatically mailed to the customer thirty (30) days before the discounted rate is scheduled to expire. The letter notifies the customer of the proposed rate change and includes another application which can be completed and returned to the company prior to the expiration of the discounted rate. A weekly report lists customers whose eligibility for the low-income discount rate has expired. If a customer failed to renew the application or is simply no

Department's First Set of Information Requests

longer eligible, the customer is removed from the low-income discount rate effective with the next bill until such time as another completed application is received by the company.

Fuel Assistance Recertification

Customers who receive fuel assistance are automatically enrolled on the low-income discount rate. The rate code change is effective as of the last meter reading so future bill statements reflect the application of the discount for the next eighteen (18) month period. Prior to the year end close of the fuel program, a letter is sent to all customers who received fuel assistance during the prior heating season encouraging them to reapply for the program for the current heating season. In April of each year, a mass mailing is sent to all customers who did not reapply or did not qualify for the fuel assistance program. The letter informs customers that their rate is scheduled to change in thirty (30) days and provides them with an application which can be completed and returned to the company to ensure continuity of the discounted rate. If a customer fails to renew the application or is simply no longer eligible for the program, the customer is removed from the low-income discount rate effective with the next bill until such time as another completed application is received by the company.

Docket No: D.T.E. 01-106 Department's First Set of Information Requests

Request No. DTE 1-6

Are customers that are located via traditional outreach methods enrolled on the low-income discount rate as of the date that they apply for the rate or as of the date that the application is confirmed or approved?

Response:

Customers that are located via traditional outreach methods are enrolled on the low-income discount effective with the previous meter reading date, from the time of receipt. Once the completed application is received, a rate change is processed and the customer is enrolled in the residential discount program. On occasion Unitil will agree to apply the discount rate retroactively on a case by case basis when notified by an agency or consumer advocate that the consumer would have been entitled to the discount at an earlier date but due to extenuating circumstances, certification of benefits was not received.

Docket No: D.T.E. 01-106
Department's First Set of Information Requests

Request No. DTE 1-7

Please provide copies of each report submitted to the Commonwealth of Massachusetts Division of Energy Resources, pursuant to G.L. c. 164, § 1F(4)(I), since March 1, 1998, regarding the company's "outreach activities and results."

Response:

Please see Attachment DTE 1-7.

Fitchburg Gas and Electric Light Company D.T.E. 97-115/98-120

Compliance Filing

Low-Income Discount Outreach and Eligibility Plan

On page 44 of the Department's Order, the Department encourages the Company to implement procedures that would increase a low-income customer's chance of taking advantage of the discounted rate.

The attached plan, which was filed with the Department of Energy Resources on December 24, 1998, provides a detailed description of the Company's outreach efforts and procedures designed to assure that the maximum number of qualifying customers participate. This plan also applies to FG&E's gas customers.

Unitil/FG&E Low-Income Discount Outreach and Eligibility Plan 12/24/98

Introduction

FG&E customers who are 175% or below the poverty level (or \$28,087 or less for a family of four) are entitled to receive a discounted rate on electric service. To assure that that the maximum number of qualifying customers participate, Unitil/Fitchburg Gas and Electric Light Company (FG&E) developed this outreach and eligibility plan. This plan is part of a six month test conducted by the Department of Energy Resources (DOER) in concert with the Massachusetts distribution companies to calibrate the outreach and compliance requirements.

Outreach

Our audience is FG&E customers with incomes 175% or below the poverty level. Our outreach communications will describe the low-income program and provide a check list of qualifications. Those who qualify will be directed to contact our customer service department to apply.

FG&E will use a targeted, direct marketing approach aimed at its new and current customers. This will be an on-going effort with consistent messaging for the duration of the program.

Below are the methods used to reach the target audience: welcome kits, bill inserts, customer service training, other collateral and welfare agency collaboration.

Welcome Kits

FG&E will reach its new customers who may qualify for the discounted rate via our welcome kit fulfillment program. After a customer has signed up for service, FG&E will mail a welcome kit to the customer. Included in the kit will be a welcome letter and multiple brochures providing comprehensive information on rates, services, safety and special programs, including a brochure on the low-income program.

Copies of the Welcome Kit will also be available at the FG&E customer walk in center in Fitchburg.

Bill Inserts

To reach current customers who may qualify for the low-income program, we will utilize bill inserts. Quarterly, we will include a low-income brochure in all customers' bills, informing them of the program.

We request a waiver on bill envelope messaging. As an alternative, we plan to print a message on FG&E customer bills which will read "enclosed insert contains information that may entitle you to discounted electricity and gas rates."

Customer Service Training

As a supplement to the Company outreach, FG&E customer service representatives inform customers not on the low-income rate of the rate and the various agency programs available. This proactive activity is usually prompted when a customer is contacted or calls us regarding a delinquency or billing issue.

All FG&E customer service personnel are fully trained on the Company's low-income program. This occurs as part of a required five-week formal training program for all customer service personnel. Customer service training and reference materials are regularly updated to reflect changes in the regulatory and utility industry environment. A review training session is conducted each year on the Company's low-income program.

Other Collateral

Unitil/FG&E will produce and distribute a Financial Hardship Form that clearly notifies the customer of the expanded availability of a low-income discount.

Additionally, Unitil/FG&E will provide a computer-generated message at the bottom of the receipts that are given to our walk-in customers. The message will state the availability of low-income rate discounts and instruct interested customers to contact FG&E for more information.

Agency Collaboration

FG&E is collaborating with welfare agencies to reach low-income citizens. Our efforts include:

- providing point of purchase materials for agency client education
- meeting with the agencies and providing fact sheets and applications for their staff so they can identify customers and instruct them to apply

The agencies we work with include:

- Department of Medical Assistance
- Department of Education (school lunch program)
- Executive Office of Elder Affairs (Senior Medicine program)
- Department of Transitional Assistance
- Department of Housing and Community Development (Fuel Assistance program)
- Department of Social Services
- Department of Revenue
- Social Security Disability
- New England Farm Workers Council

School and Children's Camp Outreach

FG&E requests a waiver for school and children camp outreach. We wish to evaluate the effectiveness of our targeted approach to our customers in six months and then determine if we need to expand our reach to employ other approaches.

Eligibility Verification

Newly Qualifying Customers

FG&E will collaborate with agencies to verify the eligibility of customers for the discounted rates. After submitting an application, the customer will contact the agency so it will verify eligibility with the utility. After receiving affirmative verification, FG&E will approve the application.

Current Discount Customers

Customers who currently receive the low-income discounted rate will be recertified by the utilities and the agencies. The process will be:

- FG&E will send the agency an electronic customer list. The list will include the customer's name, address and type of assistance involved.
- The agency will run the information against its main data base.
- The agency will respond to the utility with electronic information identifying each customer as active, closed or unknown to the system.
- FG&E will notify only those customers disqualified from receiving the discounted rate and informing the customers of the opportunity to challenge or seek another means of eligibility for the discounted rate.

Disqualified Customers

If a customer does not receive any of the above mentioned benefits and/or does not qualify for the low-income rate, FG&E will ask the customer if he or she wants information on benefits for low-income households. If appropriate, FG&E will send the customer referral and application information for the Salvation Army screening process. The Salvation Army conducts income screenings and sends us a list of eligible customers. Once we receive confirmation, the customer's rate is changed. If the Salvation Army finds the customer to be ineligible, FG&E Credit Representatives will inform the customer that they do not qualify for the low-income rate.

Schedule

Description	Jan	Feb	Mar	Apr	May	June	Comments
Welcome Kits	X	X	Х	X	X	X	Distributed via mail and walk in center.
Bill Insert		X				Х	Insert and bill message
Customer Service Training	X	Х	X	X	X	X	Walk in and in- bound telemarketing service.
Other Collateral	X	X	X	X	X	X	Financial Hardship Form Computerized message on receipts
Agency Collaboration	X	X	X	X	X	X	Meetings, POP collateral, staff collateral, eligibility collaboration

Budget

Below are the projected incremental costs for January-June:

• Brochure to be used in the welcome kit, as a bill stuffer and an information piece at the agencies and customer walk in center. Estimated cost to provide 100,000 brochures is \$6,000.

Measurement

On June 1, 1999, we will provide the DOER with a report on our programs and results. We will describe our activities, evaluate their effectiveness and recommend the forward path.



June 18, 1999

Vincent Devito
Deputy General Counsel
Division of Energy Resources
100 Cambridge Street Room 1500
Boston, MA 02202

Dear Mr. Devito:

Sincerely.

Mark Lambert

Customer Service Manager

Unitil/FG&E implemented a Low-Income Discount Outreach program in January 1999. This report reviews the approaches, their effectiveness and recommended forward path.

Of the 30,000 FG&E residential customers, we know that 2,917 qualify for the Low Income Discount. Our outreach program has been successful in adding customers to this program. As of 12/31/99, 919 customers participated in the program (631 electric and 288 gas customers). This represents an increase of 46%.

We are pleased with the success of the outreach program and will continue to implement those effective activities. Unitil FG&E is committed to identifying and assisting customers who are eligible for low income discounts as required by the Electric Utility Restructuring Act.

If you have any questions regarding any of the enclosed material, please don't hesitate to contact me directly at (603) 227-4569.

Business Office

5 McGaire Street Concord, NH 03301-4627

Concurd Electric Company
1-800-852-3339

Exeter & Humpton Electric Co.

1-800-582-7276

Fitchburg Gas and Electric Light Company

1-888-301-7700

Unitil/FG&E Low-Income Discount Outreach and Eligibility Program Report 6/18/99

Activity	Effectiveness	Forward Path
WELCOME KITS All new customers receive Welcome Kits containing, a welcome letter from the C/S Manager, Low Income / Farm Credit discount information, Summary of Rates, Bill explanation, Safety insert, Energy Conservation programs and Restructuring Information	Not yet fully implemented. Full implementation August 2, 1999.	Automate new customer identification process and send out pre-completed Welcome Kits to new customers.
BILL INSERTS In February and June, we included a Low-Income buckslip in all FG&E customer bills (31,000), informing them of the program. Also during those months, we printed a bill message reading "enclosed insert contains information that may entitle you to discounted electricity and gas rates.	We did get many calls from customers inquiring about the eligibility of the rate or whether they were already receiving the Low-Income rate.	Continue Bill Insert program on a quarterly interval cycle. This outreach effort, along with the Welcome Kit for new customers would ensure we are touching all customers.
CUSTOMER SERVICE TRAINING All FG&E customer service personnel are fully trained on the Company's Low-Income discount program. This occurs as part of the 4 week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A review training session on the Low Income program is twice each year.	Very effective and required. Because we consolidated our Customer Service Operations in April, 1998, we have had to provide Low-Income training to all of our Customer Service Representatives. Each representative has had to attend several recurring training sessions in this area.	Continue Customer Service Training

OTHER COLLATERAL FG&E produces and distributes a Financial Hardship Form that clearly notifies customers of the expanded availability of the low income discount. Unitil representatives enclose a hardship form to those customers not on the Low-Income rate and are having problems paying their current bills. A message included on the bottom of a customer's payment receipt from the walk in payment center.	We have received many good comments from identified customers. This is often used as an effective way to resolve a delinquent customer situation.	Continue Financial Hardship Form production and distribution. Do not continue walk-in receipt notification program.
AGENCY COLLABORATION FG&E is collaborating with welfare agencies to reach low- income citizens. This includes providing point of purchase material for agency client education and meeting with agencies and providing fact sheets and applications	Point of purchase materials will be provided July 19, 1999 at our walk-in payment office in Fitchburg. We are in the process of printing a similar pamphlet designed and used by Boston Edison. All Welfare agencies share their customer lists with our credit department quarterly. We then add the qualified customers to the Low-Income rate. We seldom find a new qualified customer from this collaboration but will continue with this process.	Implement point of purchase brochure in July 19, 1999. Continue Agency Collaboration efforts.

Samples Enclosed:

- February Bill Insert (green)
- June Bill Insert (yellow)
- Sample Bill with Message
- Customer Service Low Income Reference Material
- Financial Hardship Form
- POP materials for Agencies

Unitil/Fitchburg Gas and Electric Light Company Low Income Discount Outreach and Eligibility Verification December 31, 2000

Introduction

FG&E customers who are 175% or below the poverty level (\$28,087 or less for a family of four) are entitled to receive a discounted rate on gas and/or electric service. To assure that the maximum number of qualifying customers participate, Until/Fitchburg Gas and Electric Light Company has developed an outreach and eligibility plan.

Outreach

The company's audience is FG&E customers with incomes at or below 175% of the poverty level. FG&E's outreach communications describe the Low-Income discount rate program and provide a check- list of qualifications. Those who qualify will be directed to contact the Company's customer service department to apply.

FG&E will use a targeted, direct marketing approach aimed at its new and current customers. This will be an on-going effort with consistent messaging for the duration of the program.

Below are the methods used to reach the target audience: welcome kits, bill inserts, customer services training, other collateral and welfare agency collaboration.

Welcome Kits: (not yet implemented)

FG&E will reach its new customers who may qualify for the discounted rate via our welcome kit fulfillment program. After a customer has initiated new service, FG&E will mail a welcome kit to the customer. Included in the kit will be a welcome letter signed by the Customer Service manager, Low-Income discount rate information, Summary of Rates, Bill explanation, Safety insert, Energy conservation program and restructuring information. The Company plans to implement in the first quarter of 2001.

Bill Inserts:

Each February, May, August and October, the Company prints an article in the customer newsletter on the Low-Income discount rate program. This reaches approximately 31,000 FG&E electric and gas customers.

The newsletter also publishes articles on our Budget Billing Program, Energy Efficiency Program and how to contribute and apply for the Good Neighbor Energy Fund. This fund provides fuel assistance to those who do not qualify for other fuel assistance programs. FG&E also has a monthly column on Energy Saving Tips. Customer surveys indicate positive response to these articles. The Good Neighbor Energy Fund envelopes are mailed to all customers twice each year.

Customer Service Training:

All FG&E customer service personnel are fully trained on the Company's Low-Income discount rate program. This occurs as part of the 4-week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A review training session on the Low-Income discount rate program is held as needed, at a minimum twice each year.

Other Collateral:

FG&E distributes a brochure/application on the Low-Income discount rate program. This brochure is displayed at the Company's walk in payment center in Fitchburg.

Also, beginning in January 2001, during the winter moratorium months, FG&E will be sending information to all residential customers who may be having difficulty paying their bills. The information will include a list of social service agencies and telephone numbers. Payment plan information and text urging the customer to call us for assistance will also be included.

For customers in protected status such as elderly, medical, etc., FG&E will be implementing a program beginning in the first quarter of 2001 for communicating with these customers on a quarterly basis. These communications will provide social service information and discuss payment options such as payment plans and budget billing.

Media:

Beginning in December 2000, Until Fitchburg Gas and Electric Light Company ran several newspaper ads and radio spots with information concerning energy prices, energy saving tips, and low income programs.

Media	Dec 5-7 (TWT)	Dec 18-20 (MTW)	Jan 3-5 (WTF)
WEIM	3 radio spots once each day	3 radio spots once each day	3 radio spots once each day
Fitchburg Sentinel	#1 – Tues #2 – Wed #3 – Thurs	#1 - Mon #2 - Tues #3 - Wed	#1 – Wed #2 – Thurs #3 – Fri
Worcester Telegram & Gazette	#1 – Tues #2 – Wed #3 – Thurs	#1 – Mon #2 – Tues #3 – Wed	#1 – Wed #2 – Thurs #3 – Fri

Agency Collaboration:

FG&E is collaborating with welfare agencies to reach customers who are eligible for the Low-Income discount rate program. This includes providing point of purchase material for agency client education and meeting with agencies and providing fact sheets and applications. Point of purchase materials are available at our walk-in payment center in Fitchburg.

The agencies we work with include:

- Department of Medical Assistance
- Department of Education (school lunch program)
- Executive Office of Elder Affairs (Senior Medicine Program)
- Department of Transitional Assistance
- Department of Housing and Community Development (Fuel Assistance Program)
- Department of Social Services
- Social Security Disability
- New England Farm Workers Council
- Catholic Charities

School and Children Camp Outreach:

FG&E will defer this approach until after we have tested the welcome kits and special notice during the winter moratorium. We wish to evaluate the effectiveness of directly targeting our customers, and then determine if we need to expand our reach and employ less targeted approaches.

Eligibility Verification

Newly Qualifying Customers:

FG&E collaborates with agencies to verify the eligibility of customers for the discounted rates. After submitting an application, the customer will contact the agency in order to verify eligibility with the utility. After receiving affirmation verification, FG&E will approve the application.

Current Discount Customers:

Customers who currently receive the Low-Income electric and/or gas discounted rate will be re-certified by the utilities and the agencies. The process is:

- FG&E send the agency an electronic customer list. The list includes the customer's name, address and type of assistance involved.
- The agency compares the information against its main database.
- The agency responds to the utility with electronic information identifying each customer as active, closed or unknown to the system.
- FG&E notifies only those customers disqualified from receiving the discounted rate
 and informs the customer of the opportunity to challenge or seek another means of
 eligibility for the discounted rate and if appropriate refers the customer to the
 Salvation Army.

Summation of Outreach Efforts:

A description of each specific guideline and compliance activities:

Description	Implemented	Comments
Welcome Kits	No	Full implementation in the first quarter of 2001.
Bill Inserts	Yes	Each February, May, August and October, the Company prints an article in the customer newsletter on the Low-Income discounted rate program. We also provide a pamphlet that provides customers with specific information about the various programs that are available. We also provide self contained returnable application card for each customer to complete and return to FG&E.
Customer Service		Walk-in and in-bound tele-marketing service. On
Training	Yes	going process.
Other Collateral	Partially	 Financial Hardship Form Beginning in January 2001, during winter moratorium months, customers who are having difficulty paying their bills will receive a notice that contains information on social service agencies and telephone numbers along with payment plan information. Beginning in the first quarter of 2001, FG&E will communicate with customers in a protected status, such as elderly, medical, etc. on a quarterly basis. Media Campaign
Agency	Yes	Meetings, POP collateral, stall collateral, eligibility
Collaboration		collaboration.

• An explanation of eligibility verification methods employed:

The comment's section in the table above summarizes the various methods we have employed.

• Number of discount rate customers for the years 1998, 1999, and 2000

	<u>1998</u>	1999	2000
Enrolled - Gas and Electric	919 *	2604	2961
Customers Receiving Fuel Assistance 1999-2000	N/A	N/A	1740
season.			

^{*}Electric Only

 A discussion of how successful the outreach efforts have been including information on barriers faced in implementing these guidelines and programs:

Unitil's outreach efforts have greatly increased the number of Low-Income discounted rate customers. We anticipate that the welcome kits combined with our special mailing information will assist our efforts in the upcoming year.

Unitil/Fitchburg Gas and Electric Light Company Low Income Discount Outreach and Eligibility Verification December 19, 2001

Introduction

FG&E customers who are 175% or below the poverty level are entitled to receive a discounted rate on gas and/or electric service. To assure that the maximum number of qualifying customers participate, Unitil/Fitchburg Gas and Electric Light Company has developed and implemented an outreach and eligibility plan.

Outreach

The company's audience is FG&E customers with incomes at or below 175% of the poverty level. FG&E's outreach communications describe the low-Income discount rate program and provide a check- list of qualifications. Those who qualify will be directed to contact the Company's customer service department to apply.

FG&E uses a targeted, direct marketing and public relations approach aimed at its new and current customers. This is an on-going effort with consistent messaging for the duration of the program.

Below are the methods used to reach the target audience: welcome kits, bill inserts, customer service training, media, agency collaboration, school lunch program, targeted customer notice, customer education and outreach, and other collateral.

• Description of each specific guideline and compliance activities.

Welcome Kits:

FG&E communicates with new customers who may qualify for the discounted rate via our welcome kit fulfillment program. After a customer has initiated new service, FG&E mails a welcome kit to the customer. The kit includes a welcome letter signed by the Customer Service Manager, low-Income discount rate information, summary of rates, bill explanation, and energy conservation tips.

Bill Inserts:

Quarterly, the Company prints an article in the customer newsletter on the Low-Income discount rate program. This reaches approximately 31,000 FG&E electric and gas customers.

The newsletter also publishes articles on our Budget Billing Program, Energy Efficiency Program and how to contribute and apply for the Good Neighbor Energy Fund. The Good Neighbor Energy Fund envelopes are mailed to all customers twice each year. This fund provides financial assistance to those who do not qualify for other fuel assistance programs. FG&E also has a monthly column on Energy Saving Tips. Customer surveys indicate positive response to these articles.

Customer Service Training:

All FG&E customer service personnel are fully trained on the Company's Low-Income discount rate program. This occurs as part of the 4-week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A

review training session on the Low-Income discount rate program is held as needed, at a minimum twice each year.

Media:

Beginning in December 2000 and continuing through January 2001, FG&E ran several newspaper ads and radio spots with information concerning energy prices, energy saving tips, and low income programs.

Media	Dec 5-7 (TWT)	Dec 18-20 (MTW)	Jan 3-5 (WTF)
WEIM	3 radio spots once	3 radio spots once	3 radio spots once
	each day	each day	each day
Fitchburg	#1 - Tues	#1 - Mon	#1 - Wed
Sentinel	#2 - Wed	#2 - Tues	#2 - Thurs
	#3 - Thurs	#3 - Wed	#3 – Fri
Worcester	#1 - Tues	#1 - Mon	#1 – Wed
Telegram &	#2 - Wed	#2 - Tues	#2 - Thurs
Gazette	#3 - Thurs	#3 - Wed	<u>#3 – Fri</u>

Agency Collaboration:

FG&E collaborates with welfare agencies to reach customers who are eligible for the Low-Income discount rate program. This includes providing point of purchase material for agency client education and meeting with agencies and providing fact sheets and applications. Point of purchase materials are available at our walk-in payment center in Fitchburg, city hall, senior centers, and public libraries.

The agencies we work with include:

- Department of Education (school lunch program)
- Department of Transitional Assistance /Dept. of Social Services
- Department of Housing and Community Development
- Social Security Office
- New England Farm Workers Council Fuel Assistance
- Catholic Charities
- Lipton Center in Fitchburg
- Salvation Army
- MOC
- United Way

School Lunch Program:

In the fall of 2001, FG&E contacted local schools and provided a release form that is signed by the parent or guardian giving the school permission to release information to FG&E. Gardner and Fitchburg School Districts both responded positively to this idea. To date, only the Gardner School District actually distributed and returned the signed forms. Approximately 44 customers in the Gardner area received the Discount Rate as a result of this effort. Follow- up telephone calls were initiated to each customer to explain that fuel assistance may also be available and provided telephone numbers to apply. We plan to expand this program in the fall of 2002.

Customer Education & Outreach:

In 2001, FG&E initiated outreach seminars with community organizations that were advertised in local newspapers. FG&E invited representatives from New England Farm Workers (fuel assistance), Salvation Army, and MOC, to conduct and provide customer education and share information on discounted rates, fuel assistance, energy efficiency programs, bill explanations, and other services offered by the Company and agencies. Customers were able to ask questions, complete applications, schedule appointments with Fuel Assistance and enroll in the different programs immediately following the presentations. The following seminars were completed in 2001:

•	02/20/01	Fitchburg Senior Center
•	03/16/01	Gardner Library
•	04/23/01	FG&E - Spanish Event
•	10/10/01	Fitchburg Senior Center
•	10/15/01	Townsend Senior Center
•	11/07/01	Lunenburg Senior Center
•	12/06/01	Ashby American Legion

Targeted Customer Notice:

During the winter moratorium months, FG&E sends information to all residential customers who may be having difficulty paying their bills. The information includes a list of social service agencies and telephone numbers in additional to text urging the customer to call us for assistance and/or set up a payment arrangement.

Other Collateral:

FG&E distribute a brochure/application on the Low-Income discount rate program. This brochure is displayed at the Company's walk in payment center in Fitchburg.

For customers with a protected status of elderly, medical, or infant, FG&E implemented a program beginning in the first quarter of 2001 on a biannual basis. Written and telephone communications provided social service information, payment plan options and discount rate information.

• Explanation of eligibility verification methods employed

Newly Qualifying Customers:

FG&E collaborates with agencies to verify the eligibility of customers for the discounted rates, the application is submitted and then reviewed by the Company. If the customer has not included sufficient documentation to verify their eligibility for the rate, the customer is contacted and additional supporting documentation is requested. After receiving the appropriate verification either from an agency or the customer, FG&E will approve the application.

Customers who qualify for fuel assistance and meet income eligibility of 175% of poverty or less, qualify for the school lunch program, or live in subsidized housing, do not need to complete a separate FG&E discount rate application.

Current Discount Customers:

Customers who currently receive the Low-Income electric and/or gas discounted rate will be re-certified by the utilities and the agencies. The process is:

Customers are re-certified for the discount rate once per year. The customers are notified by mail in advance of any change from the discount rate to the regular rate. The letter informs the customer that their eligibility for the discount rate will expire one month from the date specified and provides the customer with sufficient instructions and the opportunity to complete another application to be returned to the Company.

Number of discount rate customers for the years 1999, 2000, and 2001

	1999	2000	<u>2001</u>
Enrolled – Gas and Electric	2604	See detailed monthly report below	See detailed monthly report below
Customers Receiving Fuel Assistance Approximately	N/A	1380 *	1740*

• Provided by New England Farmworkers - Fuel Assistance

Low Income Customers 2000:

<u>Month</u>	Electric Service	Gas Service	<u>Total</u>
January	969	1037	2006
February	1427	1043	2470
March	1462	1092	2554
April	1597	1174	2771
May	1642	1204	2846
June	1643	1207	2850
July	1598	1163	2761
August	1595	1146	2741
September	1550	1115	2665
October	1526	1094	2620
November	1398	1003	2401
December	1442	1033	2475

Low Income Customers 2001:

Month	Electric Service	Gas Service	Total 2001	Total 2000	+/- 2001
January	1493	1070	2563	2006	557
February	1669	1063	2732	2470	262
March	1727	1095	2822	2554	268
April	1873	1253	3126	2771	355
May	2038	1401	3439	2846	593
June	2071	1438	3509	2850	659
July	2062	1418	3480	2761	719
August	2024	1383	3407	2741	666
September	1989	1363	3352	2665	687
October	1676	1268	2944	2620	324
November	1826	1259	3085	2401	684
December	Not available until Jan 3 rd .	Not available until Jan 316.	Not available until Jan.	2475	N/A

 A discussion of how successful the outreach efforts have been including information on barriers faced in implementing these guidelines and programs:

In the Gardner area the school lunch program proved to be successful. We are still working with the Fitchburg School District on the status of the forms that were delivered in September and are unsure at this point of the status. Other school districts were contacted, but either did not respond or were concerned with confidentiality.

Unitil's additional outreach efforts in 2001, welcome package implemented, targeted customer notice, and customer education/outreach, have increased the number of low-Income discounted rate customers 28%. We will continue these efforts in 2002 in an attempt to reach additional families that may qualify for the rate.



December 31, 2002

Karin Pisiewski Public Information Division of Energy Resources 70 Franklin St. 7th Floor Boston, MA 02110-1313

Dear Karin:

Attached please find Unitil/Fitchburg Gas & Electric Light Co.'s year end report pertaining to residential discount rate activities for 2002.

If you have any questions please contact me at 603-227-4505.

Sincerely,

Mary-Jane Cleveland Manager Customer Service

Enclosure

Business Office

Customer Service Center 5 McGuire Street Concord, NH 03301-4622

Unitil Energy Systems, Inc. Capital Distribution <u>Operations Center</u>

1-800-852-3339

Unitil Energy Systems, Inc. Seacoast Distribution Operations Center

1-800-582-7276

Fitchburg Gas and Electric Light Company

1-888-301-7700

Unitil/Fitchburg Gas and Electric Light Company Residential Discount Rate Outreach and Eligibility Verification December 30, 2002

Introduction

Unitil/Fitchburg Gas & Electric Light Company (FG&E) customers who are 175% or below the poverty level, are entitled to receive a discounted rate on gas and/or electric service. To assure that the maximum number of qualifying customers participate, FG&E has developed and implemented an outreach and eligibility plan.

Outreach

The company's audience includes FG&E customers with incomes at or below 175% of the poverty level. FG&E outreach communications describe the residential discount rate program and provide a check-list of qualifications.

Qualifying Agencies:

TAFDC	Veteran's Chapter 15
EAEDC	Mass Veterans Benefits (GLC.115)
Food Stamps	DEC for Surviving Parents of Veterans
Mass Health	Improved Veterans Disability Pension
School Breakfast/Lunch Program	Head Start

LIHEAP – (Fuel Assistance)
Public Subsidized Housing

SSI

Those who qualify will be directed to contact FG&E's customer service department to apply.

FG&E uses a direct marketing and public relations approach targeted at its new and current customers. This is an on-going effort with consistent messaging for the duration of the program.

The methods used to reach the target audience include the following: welcome kits, bill inserts, customer service training, agency collaboration, school lunch program, targeted customer communications and customer education and outreach.

Description of each specific guideline and compliance activities.

Welcome Kits:

FG&E communicates with new customers who may qualify for the discounted rate via our welcome kit fulfillment program. After a customer has initiated new service, FG&E mails a welcome kit to the customer. The kit includes a welcome letter signed by the Customer Service Manager, residential discount rate information, summary of rates, bill explanation, energy conservation tips and payment option information.

Bill Inserts:

Quarterly, the Company prints an article in the customer newsletter on the Residential Discount Rate Program. The newsletter reaches approximately 31,000 FG&E electric and gas customers.

The newsletter also publishes articles on our Budget Billing Program, Energy Efficiency Program and how to contribute and apply for the Good Neighbor Energy Fund. The Good Neighbor Energy Fund envelopes are mailed to all customers twice each year. This fund provides financial assistance to those who do not qualify for other fuel assistance programs.

FG&E also has a monthly column on Energy Saving Tips. Customer surveys indicate positive response to these articles.

Web Site:

The FG&E website at www.Unitil.com provides customers with information about the residential discount rate, agency information and a copy of the FG&E discount rate application. The website also offers additional information regarding payment options, including budget billing, energy efficiency programs and pertinent energy saving tips.

Customer Service Training:

All FG&E customer service personnel are fully trained on the Company's Residential Discount Rate Program. This occurs as part of the 4-week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A review training session on the Low-Income discount rate program is held as needed.

Agency Collaboration:

FG&E collaborates with welfare agencies to reach customers who are eligible for the residential discount rate. This includes providing point of purchase material for agency client education and meeting with agencies and providing fact sheets and applications. Points of purchase materials are available at our walk-in payment center in Fitchburg, city hall, senior centers, public libraries, housing court and local welfare offices.

The agencies we work with include:

- Department of Education (school lunch program)
- Department of Transitional Assistance / Dept. of Social Services
- Department of Housing and Community Development
- Social Security Office
- New England Farm Workers Council Fuel Assistance
- Catholic Charities
- Lipton Center in Fitchburg
- Salvation Army
- MOC
- United Way

<u>Energy Forum</u> - Once per quarter, FG&E participates in an energy forum hosted by the United Way of North Central Massachusetts. Other attendees include representatives from agencies such as New England Farm Workers Council, MOC, Salvation Army, Catholic Charities and representatives of local elected officials. The participants share information about programs available to income-eligible customers and results of outreach efforts. The participants also discuss methods to increase community awareness of programs offered by agencies.

Market Research Study - In 2002 FG&E, along with other Massachusetts investor-owned utilities, sponsored a low income utility market research study in order to identify strategies that can be used to increase the rate of participation by low-income households in the discount rate and weatherization programs in order to increase the affordability of home energy for low-income households and reduce arrearages and shut-offs.

School Lunch Program:

In the fall of 2001 and 2002, FG&E contacted local schools and provided a release form that is signed by the parent or guardian giving the school permission to release information to FG&E. In 2002, approximately 257 gas customers and 281 electric customers received the discount rate as a result of this outreach effort.

Customer Education & Outreach:

In 2002, FG&E conducted outreach seminars with community organizations that were advertised in local newspapers. FG&E invited representatives from New England Farm Workers (fuel assistance), Salvation Army and MOC, to conduct and provide customer education and share information on discounted rates, fuel assistance, energy efficiency programs, bill explanations, and other services offered by FG&E and agencies. Customers have an opportunity to ask questions, complete applications, schedule appointments with Fuel Assistance and enroll in the different programs immediately following the presentations. Interest is spotty at the Senior Centers – 25 attended the Fitchburg Senior Center presentation, while no one attended the Townsend event.

FG&E is looking to reach the working poor and rented a booth at a Sunday Flea Market with moderate success and also conducted a Spanish event, attended by staff from the Spanish American Center. The following seminars have been completed in 2002:

•	9/22/02	Fitchburg Flea Market
•	10/7/02	Townsend Senior Center
•	10/16/02	Fitchburg Senior Center
•	10/16/02	Spanish Event at FGE

Targeted Customer Notice:

During the winter moratorium months, FG&E sends information to all residential customers who may be having difficulty paying their bills. The information includes a list of social service agencies and telephone numbers in additional to text urging the customer to call us for assistance and/or set up a payment arrangement.

In addition, in the third quarter of each year, FG&E sends information about the fuel assistance program to all residential customers who have filed a declaration of financial hardship. The letter provides information sufficient to initiate an application and includes the agency name, address and telephone number.

Other Collateral:

FG&E distributes a brochure/application on the Residential Discount Rate Program. This brochure is displayed at the Company's walk in payment center in Fitchburg.

On a biannual basis, FG&E contacts customers who have been flagged as elderly, medical, or infant. Written and telephone communications provide social service information, payment plan options and discount rate information.

Explanation of eligibility verification methods employed

Newly Qualifying Customers:

FG&E collaborates with agencies to verify the eligibility of customers for the discounted rates. The application is submitted and then reviewed by the Company. If the customer has not included sufficient documentation to verify their eligibility for the rate, the customer is contacted

and additional supporting documentation is requested. After receiving the appropriate verification either from an agency or the customer, FG&E will approve the application.

Customers who qualify for fuel assistance and meet income eligibility of 175% of poverty or less, qualify for the school lunch program, or live in subsidized housing, do not need to complete a separate FG&E discount rate application in order to receive the benefit.

Current Discount Customers:

Customers who currently receive the residential electric and/or gas discounted rate will be recertified by the utilities and the agencies. The process is:

Customers are re-certified for the discount rate once per year. Customers who have not recertified for a qualifying benefit program within the past year (see note pertaining to Fuel Assistance) are notified by mail in advance of any change from the discount rate to the regular rate. The letter informs the customer that their eligibility for the discount rate will expire one month from the date specified and provides the customer with sufficient instructions and the opportunity to complete another application to be returned to the Company.

• Number of discount rate customers for the years 2000, 2001, and 2002:

	2000	<u>2001</u>	2002
Enrolled – Gas and Electric	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW
Customers Receiving Fuel Assistance (Approximate)	1380 *	1740*	1450 As of 10/30/02

Provided by New England Farmworkers – Fuel Assistance

Residential Discount Rate Customers 2000:

Month	Electric Service	Gas Service	Total 2000
January	969	1037	2006
February	1427	1043	2470
March	1462	1092	2554
April	1597	1174	2771
May	1642	1204	2846
June	1643	1207	2850
July	1598	1163	2761
August	1595	1146	2741
September	1550	1115	2665
October	1526	1094	2620
November	1398	1003	2401
December	1442	1033	2475

^{**} Note - Fuel Assistance Customers - Due to the seasonal enrollment opportunity, Fuel Assistance customers remain on the discount rate for approximately 18 months in order to give them an opportunity to reapply for the program and not loose the benefit.

Residential Discount Rate Customers 2001:

<u>Month</u>	Electric Service	Gas Service	<u>Total 2001</u>
January	1493	1070	2563
February	1669	1063	2732
March	1727	1095	2822
April	1873	1253	3126
May	2038	1401	3439
June	2071	1438	3509
July	2062	1418	3480
August	2024	1383	3407
September	1989	1363	3352
October	1676	1268	2944
November	1826	1259	3085
December	1925	1293	3218

Residential Discount Rate Customers 2002:

Month	Electric Service	Gas Service	Total 2002	
January	1917	1329	3246	
February	2058	1444	3502	
March	2182	1568	3750	
April	2225	1606	3831	
May	2220	1596	3816	
June	2204	1578	3782	
July	2171	1538	3709	
August	2146	1509	3655	
September	2008	1393	3401	
October	2011	1394	3405	
November	1754	1249	3003	
December	Not Avail, Until	Not Avail. Until	Not Avail. Until 1/6/03	
	1/6/03	1/6/03		

Residential Discount Rate Customers - Comparison by Year:

<u>Month</u>	Electric Service	Gas Service	Total 2002	Total 2001	Total 2000	+/- 2001 vs. 2000	+/- 2002 vs. 2000
January	1917	1329	3246	2563	2006	557	1240
February	2058	1444	3502	2732	2470	262	1032
March	2182	1568	3750	2822	2554	268	1196
April	2225	1606	3831	3126	2771	355	1060
May	2220	1596	3816	3439	2846	593	970
June	2204	1578	3782	3509	2850	659	932
July	2171	1538	3709	3480	2761	719	948
August	2146	1509	3655	3407	2741	666	914
September	2008	1393	3401	3352	2665	687	736
October	2011	1394	3405	2944	2620	324	785
November	1754	1249	3003	3085	2401	684	602
December	Not Avail Until 1/6/03	Not Avail. Until 1/6/03	Not Avail. Until 1/6/03	3218	2475	743	Not Avail. Until 1/6/03

 A discussion of how successful the outreach efforts have been including information on barriers faced in implementing these guidelines and programs:

FG&E's additional outreach efforts, which include working with local public schools and the addition of targeted communications, have been successful and have resulted in an increase in the number of residential discount rate customers. We will continue these efforts in 2003 in an attempt to reach additional families that may qualify for the rate.

Unitil/Fitchburg Gas and Electric Light Company Residential Discount Rate Outreach and Eligibility Verification Report December 30, 2003

Introduction

Unitil/Fitchburg Gas & Electric Light Company (FG&E) customers who are 175% or below the poverty level, are entitled to receive a discounted rate on gas and/or electric service. To assure that the maximum number of qualifying customers participate, FG&E has developed and implemented an outreach and eligibility plan.

Outreach

The company's audience includes FG&E customers with incomes at or below 175% of the poverty level. FG&E outreach communications describe the residential discount rate program and provide a check-list of qualifications.

Qualifying Agencies:

TAFDC
EAEDC
Food Stamps
Mass Health (DMA) & (DTA)
Mass Health (Mass Comm for the Blind)
School Breakfast/Lunch Program
LIHEAP – (Fuel Assistance)

Veteran's Chapter 15
Veterans Benefits (GLC.115)
DEC for Surviving Parents of Veterans
Veteran's Non-Service Pension/DIC
Head Start
SSI
Public Subsidized Housing

Those who qualify will be directed to contact FG&E's customer service/credit departments to apply.

FG&E uses a direct marketing and public relations approach targeted at its new and current customers. This is an on-going effort with consistent messaging for the duration of the program.

The methods used to reach the target audience include the following: welcome kits, bill inserts, customer service training, agency collaboration, school lunch program, targeted customer communications and customer education and outreach.

• Description of each specific guideline and compliance activities.

Welcome Kits:

FG&E communicates with new customers who may qualify for the discounted rate via our welcome kit fulfillment program. After a customer has initiated new service, FG&E mails a welcome kit to the customer. The kit includes a welcome letter, residential discount rate information, summary of rates, bill explanation, energy conservation tips and payment option information.

Bill Inserts:

Quarterly, the Company prints an article in the customer newsletter on the Residential Discount Rate Program. The newsletter reaches approximately 31,000 FG&E electric and gas customers.

The newsletter also publishes articles on our Budget Billing Program, Energy Efficiency Programs and how to contribute and apply for the Good Neighbor Energy Fund. The Good Neighbor Energy

Fund envelopes are mailed to all customers twice each year. This fund provides financial assistance to those who do not qualify for other fuel assistance programs. FG&E also has a monthly column on Energy Saving Tips. Customer surveys indicate positive response to these articles.

Web Site:

The FG&E website at www.Unitil.com provides customers with information about the residential discount rate, agency information and a copy of the FG&E discount rate application. The website also offers additional information regarding payment options, including budget billing, energy efficiency programs and pertinent energy saving tips.

Customer Service Training:

All FG&E customer service personnel are fully trained on the Company's Residential Discount Rate Program. This occurs as part of the 4-week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A review training session on the residential discount rate program is held as needed.

Agency Collaboration:

FG&E collaborates with welfare agencies to reach customers who are eligible for the residential discount rate.

The agencies we work with include:

- Department of Education (school lunch program)
- Department of Transitional Assistance /Dept. of Social Services
- Department of Housing and Community Development
- Social Security Office
- New England Farm Workers Council Fuel Assistance
- Catholic Charities
- Lipton Center in Fitchburg
- Salvation Army
- MOC
- United Way

School Lunch Program:

Again in 2003, FG&E worked with the Fitchburg School District to identify eligible customers through the free school lunch program. As a result approximately 700 applicants were received. (note, some of these customers also receive fuel assistance or participate in another program that qualify them for the discount rate).

Customer Education & Outreach:

In 2003, FG&E conducted outreach seminars with community organizations that were advertised in local newspapers. FG&E invited representatives from New England Farm Workers (fuel assistance), Salvation Army and MOC, to conduct and provide customer education and share information on discounted rates, fuel assistance, energy efficiency programs, bill explanations, and other services offered by FG&E and agencies.

Controlling Energy Costs Events in 2003:

• 3/12/03 - Lunenburg Senior Center

- 9/08/03 Mark Dohan, Twin Cities CDC
- 9/22/03 WEIM interview on Controlling Energy Costs *
- 9/24/03 Fitchburg Public Library
- 9/24/03 Community Leaders Presentation
- * FATV broadcasts of 9/24 presentation in 2003: 9/30,10/01,10/02,10/04,10/08,10/09, 10/14,10/21

Energy Bucks:

The state's investor-owned utilities, the Low- Income Energy Affordability Network and Massachusetts Community Action Program Directors Association have launched Energy Bucks to help low-income and qualified households reduce their energy costs. FG&E participates in this program.

Fitchburg, which is serviced by FG&E, is among 14 cities and towns targeted by the program. Energy Bucks will focus on building awareness of fuel assistance, discount energy rates and energy efficiency services available to families on limited income and encourage them to apply for the programs.

Targeted Customer Notice:

During the winter moratorium months, FG&E sends information to all residential customers who may be having difficulty paying their bills. The information includes a list of social service agencies and telephone numbers in additional to text urging the customer to call us for assistance and/or set up a payment arrangement.

In addition, in the third quarter of each year, FG&E sends information about the fuel assistance program to all residential customers who have filed a declaration of financial hardship. The letter provides information sufficient to initiate an application and includes the agency name, address and telephone number.

Other Collateral:

FG&E distributes a brochure/application on the Residential Discount Rate Program. This brochure is displayed at the Company's walk in payment center in Fitchburg.

On a routine basis, FG&E contacts customers who have been flagged as elderly, medical, or infant. Written and telephone communications provide social service information, payment plan options and discount rate information.

Explanation of eligibility verification methods employed

Newly Qualifying Customers:

FG&E collaborates with agencies to verify the eligibility of customers for the discounted rates. The application is submitted and then reviewed by the Company. If the customer has not included sufficient documentation to verify their eligibility for the rate, the customer is contacted and additional supporting documentation is requested. After receiving the appropriate verification either from an agency or the customer, FG&E will approve the application.

Customers who qualify for fuel assistance and meet income eligibility of 175% of poverty or less, qualify for the school lunch program, or live in subsidized housing, do not need to complete a separate FG&E discount rate application in order to receive the benefit.

Current Discount Customers:

Customers who currently receive the residential electric and/or gas discounted rate will be recertified by the utilities and the agencies. The process is:

Customers are re-certified for the discount rate once per year. Customers who have not recertified for a qualifying benefit program within the past year (see note pertaining to Fuel Assistance) are notified by mail in advance of any change from the discount rate to the regular rate. The letter informs the customer that their eligibility for the discount rate will expire one month from the date specified and provides the customer with sufficient instructions and the opportunity to complete another application to be returned to the Company.

• Number of discount rate customers for the years 2000, 2001, 2002 & 2003

	2000	2001	2002	2003
Enrolled – Gas and Electric	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW
Customers Receiving Fuel Assistance (Approximate)	1380	1740	1450	1504

Residential Discount Rate Customers 2000:

Month	Electric Service	Gas Service	Total 2000
January	969	1037	2006
February	1427	1043	2470
March	1462	1092	2554
April	1597	1174	2771
May	1642	1204	2846
June	1643	1207	2850
July	1598	1163	2761
August	1595	1146	2741
September	1550	1115	2665
October	1526	1094	2620
November	1398	1003	2401
December	1442	1033	2475

Residential Discount Rate Customers 2001:

Month	Electric Service	Gas Service	<u>Total 2001</u>
January	1493	1070	2563
February	1669	1063	2732
March	1727	1095	2822
April	1873	1253	3126
May	2038	1401	3439
June	2071	1438	3509
July	2062	1418	3480
August	2024	1383	3407
September	1989	1363	3352
October	1676	1268	2944
November	1826	1259	3085
December	1925	1293	3218

^{**} Note - Fuel Assistance Customers - Due to the seasonal enrollment opportunity, Fuel Assistance customers remain on the discount rate for approximately 18 months in order to give them an opportunity to reapply for the program and not loose the benefit.

Residential Discount Rate Customers 2002:

<u>Month</u>	Electric Service	Gas Service	Total 2002
January	1917	1329	3246
February	2058	1444	3502
March	2182	1568	3750
April	2225	1606	3831
May	2220	1596	3816
June	2204	1578	3782
July	2171	1538	3709
August	2146	1509	3655
September	2008	1393	3401
October	2011	1394	3405
November	1754	1249	3003
December	1791	1270	3061

Residential Discount Rate Customers 2003:

Month	Electric Service	Gas Service	Total 2003
January	1928	1347	3275
February	1985	1416	3401
March	2078	1493	3571
April	2170	1582	3752
May	2252	1661	3913
June	2248	1657	3905
July	2213	1611	3824
August	2198	1594	3792
September	2163	1555	3718
October	2408	1749	4157
November	2403	1741	4144
December	Not Available until 01/06/04	Not Available until 01/06/04	Not Available until 01/06/0

 A discussion of how successful the outreach efforts have been including information on barriers faced in implementing these guidelines and programs:

FG&E's additional outreach efforts, which include working with local public schools and the addition of targeted communications, have been successful and have resulted in an increase in the number of residential discount rate customers. We will continue these efforts in 2004 in an attempt to reach additional families that may qualify for the rate.

Unitil/Fitchburg Gas and Electric Light Company Residential Discount Rate Outreach and Eligibility Verification Report December 29, 2004

Introduction

Unitil/Fitchburg Gas & Electric Light Company (FG&E) customers who are 175% or below the poverty level, are entitled to receive a discounted rate on gas and/or electric service. To assure that the maximum number of qualifying customers participate, FG&E has developed and implemented an outreach and eligibility plan.

Outreach

The company's audience includes FG&E customers with incomes at or below 175% of the poverty level. FG&E outreach communications describe the residential discount rate program and provide a check-list of qualifications.

Qualifying Agencies:

TAFDC
EAEDC
Food Stamps
Mass Health (DMA) & (DTA)
Mass Health (Mass Comm for the Blind)
School Breakfast/Lunch Program
LIHEAP – (Fuel Assistance)

Veteran's Chapter 15
Veterans Benefits (GLC.115)
DEC for Surviving Parents of Veterans
Veteran's Non-Service Pension/DIC
Head Start
SSI
Public Subsidized Housing

Those who qualify will be directed to contact FG&E's customer service/credit departments to apply.

FG&E uses a direct marketing and public relations approach targeted at its new and current customers. This is an on-going effort with consistent messaging for the duration of the program.

The methods used to reach the target audience include the following: welcome kits, bill inserts, customer service training, agency collaboration, school lunch program, targeted customer communications and customer education and outreach.

Description of each specific guideline and compliance activities:

Welcome Kits:

FG&E communicates with new customers who may qualify for the discounted rate via our welcome kit fulfillment program. After a customer has initiated new service, FG&E mails a welcome kit to the customer. The kit includes a welcome letter, residential discount rate information, summary of rates, energy conservation tips, opt out information, and payment option information.

Bill Inserts:

Quarterly, the Company prints an article in the customer newsletter on the Residential Discount Rate Program. The newsletter reaches approximately 31,000 FG&E electric and gas customers.

The newsletter also publishes articles on our Budget Billing Program, Energy Efficiency Programs and how to contribute and apply for the Good Neighbor Energy Fund. The Good Neighbor Energy Fund envelopes are mailed to all customers twice each year. This fund provides financial assistance to those who do not qualify for other fuel assistance programs. FG&E also has a

monthly column on Energy Saving Tips. Customer surveys indicate positive response to these articles. All newsletters and bill inserts can be accessed on our website.

Web Site:

The FG&E website at www.Unitil.com provides customers with information about the residential discount rate, agency information and a copy of the FG&E discount rate application. The website also offers additional information regarding payment options, including budget billing, energy efficiency programs and pertinent energy saving tips.

Customer Service Training:

All FG&E customer service personnel are fully trained on the Company's Residential Discount Rate Program. This occurs as part of the initial 4-6 week formal training program for all customer service personnel. Reference materials are provided and regularly updated. A review training session on the residential discount rate program is held annually.

Agency Collaboration:

FG&E collaborates with welfare agencies to reach customers who are eligible for the residential discount rate.

The agencies we work with include:

- Department of Education (school lunch program)
- Department of Transitional Assistance /Dept. of Social Services
- Department of Housing and Community Development
- Social Security Office
- New England Farm Workers Council Fuel Assistance
- Catholic Charities
- Lipton Center in Fitchburg
- Salvation Army
- MOC
- United Way
- Residential Assistance to Families in Transition (RAFT) Pilot Program

School Lunch Program:

Again in 2004, FG&E worked with the Fitchburg School District to identify eligible customers through the free school lunch program. As a result approximately 435 applicants were received. (note, some of these customers also receive fuel assistance or participate in another program that qualifies them for the discount rate).

Customer Education:

The focus of our Controlling Energy Cost Presentations in 2004 was energy efficiency; however a brief overview was given on low income programs and discount rates. Below is a list of the events completed in 2004:

- o 10/6 WEIM radio
- o 10/12 FATV
- o 10/27 WGAW radio
- o 11/4 WEIM radio
- o 11/17 Fitchburg YMCA
- o 11/22 North Central MA United Way Community Forum Fitchburg
- 12/8 Unitil Consumer Advisory Counsel meeting

Energy Bucks:

The state's investor-owned utilities, the Low-Income Energy Affordability Network and Massachusetts Community Action Program Directors Association have launched Energy Bucks to help low-income and qualified households reduce their energy costs. FG&E participates in this program.

Fitchburg, which is serviced by FG&E, is among 14 cities and towns targeted by the program. Energy Bucks will focus on building awareness of fuel assistance, discount energy rates and energy efficiency services available to families on limited income and encourage them to apply for the programs.

Targeted Customer Notice:

During the winter moratorium months, FG&E sends information to all residential customers who may be having difficulty paying their bills. The information includes a list of social service agencies and their telephone numbers in addition to text urging the customer to call us for assistance and/or set up a payment arrangement.

Beginning 2004, in the first quarter of each year, FG&E sends a targeted mailing to residential customers where household occupants are identified age 65 or older which includes information about fuel assistance, other agency programs and the discount rate.

In addition, in the third quarter of each year, FG&E sends information about the fuel assistance program to all residential customers who have filed a declaration of financial hardship. The letter provides information sufficient to initiate an application and includes the agency name, address and telephone number.

Also, in the fourth quarter 2004, the customer service department initiated a vigorous telephone campaign to contact customers who may be eligible to receive funds from the Residential Assistance to Families in Transition (RAFT) Pilot Program to assist with payment of their overdue utility bills. Customers targeted by this initiative are eligible to receive financial assistance up to \$1,500 per family if their gross income for the household does not exceed 130 % of the federal poverty guidelines, have been shut off for non-payment or have an outstanding prior bill, have a rent or mortgage payment which exceeds ½ of their monthly income and have a child under the age of 21 residing in the home.

Other Collateral:

FG&E distributes a brochure/application on the Residential Discount Rate Program. This brochure is displayed at the Company's walk in payment center in Fitchburg. In 2004, brochures/applications were also delivered to the chief of police for distribution at the police station in Fitchburg.

On a quarterly basis, FG&E contacts customers who have been flagged as elderly, medical, or infant. Written and telephone communications provide social service information, payment plan options and discount rate information.

In the third quarter of 2004, FG&E published an updated brochure entitled a "Guide to Customer Assistance Programs" for distribution to customers. The brochure contains a comprehensive list of social service agencies located in the cities and towns served by FG&E together in addition to a description of each program offered by the agencies and necessary contact information.

• Explanation of eligibility verification methods employed:

Newly Qualifying Customers:

FG&E collaborates with agencies to verify the eligibility of customers for the discounted rates. The application is submitted and then reviewed by the Company. If the customer has not included sufficient documentation to verify their eligibility for the rate, the customer is contacted and additional supporting documentation is requested. After receiving the appropriate verification either from an agency or the customer, FG&E will approve the application.

Customers who qualify for fuel assistance and meet income eligibility of 175% of poverty or less, qualify for the school lunch program, or live in subsidized housing, do not need to complete a separate FG&E discount rate application in order to receive the benefit.

Current Discount Customers:

Customers who currently receive the residential electric and/or gas discounted rate will be recertified by the utilities and the agencies. The process is:

Customers are re-certified for the discount rate once per year. Customers who have not recertified for a qualifying benefit program within the past year (see note pertaining to Fuel Assistance) are notified by mail in advance of any change from the discount rate to the regular rate. The letter informs the customer that their eligibility for the discount rate will expire one month from the date specified and provides the customer with sufficient instructions and the opportunity to complete another application to be returned to the Company.

** Note - Fuel Assistance Customers - Due to the seasonal enrollment opportunity, Fuel Assistance customers remain on the discount rate for approximately 18 months in order to give them an opportunity to reapply for the program and not loose the benefit.

Number of discount rate customers for the years 2000, 2001, 2002, 2003 & 2004:

	2000	<u>2001</u>	2002	2003	<u>2004</u>
Enrolled – Gas and Electric	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW	SEE DETAILED MONTHLY REPORT BELOW
Customers Receiving Fuel Assistance (Approximate)	1380	1740	1450	1504	1391

Residential Discount Rate Customers 2000:

Month	Electric Service	Gas Service	<u>Total 2000</u>
January	969	1037	2006
February	1427	1043	2470
March	1462	1092	2554
April	1597	1174	2771
May	1642	1204	2846
June	1643	1207	2850
July	1598	1163	2761
August	1595	1146	2741
September	1550	1115	2665

October	1526	1094	2620
November	1398	1003	2401
December	1442	1033	2475

Residential Discount Rate Customers 2001:

Month	Electric Service	Gas Service Total 2001	
January	1493	1070	2563
February	1669	1063	2732
March	1727	1095	2822
April	1873	1253	3126
May	2038	1401	3439
June	2071	1438	3509
July	2062	1418	3480
August	2024	1383	3407
September	1989	1363	3352
October	1676	1268	2944
November	1826	1259	3085
December	1925	1293	3218

Residential Discount Rate Customers 2002:

Month	Electric Service	Gas Service		
January	1917	1329	3246	
February	2058	1444	3502	
March	2182	1568	3750	
April	2225	1606	3831	
May	2220	1596	3816	
June	2204	1578	3782	
July	2171	1538	3709	
August	2146	1509	3655	
September	2008	1393	3401	
October	2011	1394	3405	
November	1754	1249	3003	
December	1791	1270	3061	

Residential Discount Rate Customers 2003:

Month	Electric Service	Gas Service	<u>Total 2003</u>
January	1928	1347	3275
February	1985	1416	3401
March	2078	1493	3571
April	2170	1582	3752
May	2252	1661	3913
June	2248	1657	3905
July	2213	1611	3824
August	2198	1594	3792
September	2163	1555	3718

October	2408	1749	4157
November	2403	1741	4144
December	2401	1736	4137

Residential Discount Rate Customers 2004:

<u>Month</u>	Electric Service	Gas Service Total 2004	
January	2405	1736	4141
February	2410	1736	4146
March	2623	1871	4494
April	2262	1580	3842
May	2352	1661	4013
June	2349	1651	4000
July	2309	1614	3923
August	2267	1561	3828
September	2236	1529	3765
October	2267	1558	3825
November	2215	1521	3736
December	Not Available	Not Available	Not Available
	until 01/05	until 01/05	until 01/05

• A discussion of how successful the outreach efforts have been including information on barriers faced in implementing these guidelines and programs:

FG&E's additional outreach efforts, which include working with local public schools and the addition of targeted communications, have been successful and have resulted in an increase in the number of residential discount rate customers. We will continue these efforts in 2005 in an attempt to reach additional families that may qualify for the rate. Outreach efforts, combined with the new data sharing program through the Office of Health and Human Services, that will begin in January 2005 should result in our reaching many additional families who qualify for the rate.

Commonwealth of Massachusetts Department of Telecommunications and Energy Investigation to Increase the Participation Rate for Discounted Electric, Gas and Telephone Service

Docket No: D.T.E. 01-106 Department's First Set of Information Requests

Request No. DTE 1-8

For each of the last twelve months, please provide the total number of low-income customers, the number of customers added to the low-income discount rate in each month and the number of customers removed from the low-income discount rate in each month.

Response:

The total number of customers on the discount rate by month:

Month	Customers/Electric Service R2 Class	Customers / Gas Service R2	Customers/ Gas Service R4
September 2004	2236	249	1280
October 2004	2267	255	1303
November 2004	2215	249	1272
December 2004	2333	277	1326
January 2005	2373	284	1360
February 2005	2408	287	1390
March 2005	2470	292	1442
April 2005	2374	268	1417
May 2005	2436	267	1480
June 2005	2364	259	1423
July 2005	2322	255	1377
August 2005	2296	259	1336

Currently, Unitil does not track the actual number of customers added or removed from the discount rate separately each month.

Person Responsible: Mark A. Lambert Date: September 20, 2005